

**BANNACK STATE PARK
MANAGEMENT PLAN**

DECISION RECOMMENDATION

January 22, 2001

Summary of Preferred Management Plan Alternatives

In 1999, Montana Fish, Wildlife & Parks began the ambitious process of developing a comprehensive Management Plan for Bannack State Park. In an innovative approach to the planning process, twenty-four individuals, representing a wide-range of FWP employees and private citizens, were invited to join the planning team. Together, with the public comments gathered during the scoping phase of the planning process, this diverse group was able to tackle difficult and complex issues, and come to consensus on the best alternatives for the long-range management and operation of Bannack State Park. A draft Management Plan was distributed for public review in October, 2000. This Plan delineated a mission statement for the Park and identified what it was that visitors loved and wanted to preserve (The Bannack Experience).

The planning team examined a broad range of issues and ultimately grouped them into eight major categories. The following summarizes the preferred approaches for each issue. These approaches collectively form the preferred management plan alternative for Bannack State Park.

<u>Issue</u>	<u>Approach</u>
1) <i>Building Preservation & Stabilization</i>	Categorize buildings into preservation types based on use, historic integrity and public safety, and prescribe levels of treatment for each category; Basic Preservation, Core Buildings, and Adapted and New Buildings.
2) <i>Visitor Management</i>	Disperse visitors over time and throughout the park, provide better access for visitors with disabilities, limit special events to those that are historically relevant, address park security issues, and establish an approach for the carrying capacity for the park.
3) <i>Interpretation</i>	Interpretive programs should be creative and innovative and not detract from the Bannack Experience. Within the town site interpretive methods would be employed that retained the environment of abandonment and would promote self-discovery. Expanded interpretation, using a variety of techniques, interaction and hands-on activities would be provided in a new or expanded visitor center.
4) <i>Cultural Resource Management</i>	Develop guidelines and procedures for archive and artifact management, prepare an archaeology plan, prepare an artifact acquisition and collection policy, develop a cemetery policy, and determine priorities and methods to preserve integrity of the cultural view shed.

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| 5) <i>Facilities and Infrastructure</i> | All improvements, new facilities, and infrastructure be designed to maintain the Bannack Experience, blend into the environment, avoid a commercialized look to Bannack, and meet the Secretary of Interior's Standards for New Construction in historic places. Maintain camping at a basic level without RV electrical or water hookups, flush toilets, or shower facilities. |
| 6) <i>Public Health and Safety</i> | Developed fire risk and control and emergency plans. Recognized the need to address additional public health and safety related issues, comply with applicable codes and regulations, and balance these needs within the context of the Bannack Experience. |
| 7) <i>Natural Resources</i> | Maintain, perpetuate, and interpret a healthy natural environment that reflects the historic, natural evolution of Bannack. Develop a Natural Resource Plan amendment to the Management Plan. |
| 8) <i>Recreation</i> | Offer a variety of recreational opportunities and balance them within the context of the Bannack Experience. |

Public Comment Opportunity

The **draft** Bannack Management Plan was released for public comment on October 16, 2000. The Executive Summary was mailed to over 150 interested parties, the full plan was printed on the FWP website, and a news release was distributed statewide advertising the availability of the plan. The public comment period ran through November 17, 2000. During the comment period, on November 2, 2000, an open house was held in Dillon, Montana from 4:30 to 7 p.m. Eleven (11) Planning Team members hosted six (6) members of the public at the open house.

Public Comment Summary

A total of eleven written comments were received by the close of the comment period. The comments covered many topics and no issue generated significant controversy. In general, comments were supportive of the overall plan and the process that delivered the plan to this stage.

Public Comment #1 & 2: Two of the written comments were from Planning Team members (Jeff Erickson & Curly Anderson) pointing out typographical or editing errors in the document. Other planning team members submitted "marked up" copies of the plan to the planning consultant, which pointed out typo and layout errors.

FWP Response #1 & 2:

1. Curly Anderson
 - 1a. Note regarding typo: rail instead of trail. Change on page xiv made.
 - 1b. Historical correction: James Stuart was not present at Alder Gulch. Text in Bannack Management Plan, page 1, will be corrected to reflect that James Stuart was, in fact, not one of the original discoverers of gold in Alder Gulch.

2. Jeff Erickson

Grammatical changes noted.

Public Comment #3: Bob Raney, Executive Director for Montana State Parks Foundation, submitted comments that concurred with the majority of the proposals in the Management Plan and specifically supported the proposed rehabilitation of Grasshopper Creek and reclamation of areas that supply run-off water to the creek. He also expressed support for maintaining the park infrastructure, including toilets and drain fields. The Foundation expressed strong opposition to funding Bannack improvements with entrance fees charged Montana residents, and to the proposed construction of a new visitor center. Mr. Raney additionally stated that, "Efforts to tell the story of Beaverhead County should be made in a museum in Dillon."

FWP Response #3:

3. Bob Raney

3a. Fees

Fees were an issue that was discussed in public scoping and also in steering committee meetings. Some people felt that increasing fees would be one way to keep visitation numbers down as well as serve as a potential source of dedicated income for Bannack; others clearly felt that increasing fees would be a serious problem for families, low-income persons, and local residents. Ultimately, the steering committee did not address fees because it is an issue that is handled at the state level, not by individual parks. A short description of fees is included under "Other Issues/Public Comments" in the plan.

3b. Visitor Center

The visitor center is designed to serve several purposes, including interpretation of Bannack that expands on the walking tour guide, staff offices, archive and record storage, and restroom facilities. The intent is to interpret the history of Bannack not the entire county. Members of the Bannack Association, who have been active in the development of this management plan as well as various ongoing activities at Bannack, are also members of the museum in Dillon. This promotes a good connection between the two institutions and helps eliminate overlap and duplication. Construction of a visitor center will require an environmental analysis and we will solicit public comment on various details of the facility at that time.

Public Comment #4: Three (3) staff members of the Montana Historical Society staff submitted comments on their particular areas of expertise. Kirby Lambert, Curator of Collections, supported plan proposals to create an in-house preservation stabilization and maintenance crew and to keep as many Bannack buildings open for public accessibility but not necessarily all buildings. Support was also expressed for the suggested methods of spreading out visitors within the parks (i.e., mine tour, interpretive trails, etc.) and for construction of a new visitor center. He did caution that a new visitor center should not impact, visually or physically, the historic setting. Additional comments from Mr. Lambert supported the basic approach to interpretation (keep "technology" out!), the proper management of archival and artifact collections, the approach of maintaining the historical integrity and keeping camping facilities basic.

FWP Response #4:

4. Kirby Lambert

4a. Building preservation and stabilization.
Comment noted.

4b. Visitor Management—visitor center not to impact historic setting
We have added the following sentence as noted below.

Any new construction will be designed and built to minimize impacts to the historic setting.

Preservation Principles, 8. New Structures-add the new sentence at the end of the paragraph.

Action A1-4 “Construct a new visitor center...” –add the new sentence at the end of the paragraph.

4c-e.

Other items noted by Mr. Lambert. Comments noted. Acquisition policies are discussed under Goal 4c.

Public Comment #5: Mark Baumler, State Historic Preservation Officer, supported the proposed agreement between FWP and the State Historic Preservation Office (SHPO) and further suggested that FWP partner with the Montana Historic Society, Montana Heritage Commission (Virginia City), and the Bureau of Land Management (BLM). Support was expressed for the need for an archaeological management plan and the completion of Historic Structures Reports for all Bannack buildings.

FWP Response #5:

5. Mark Baumler

5a. Potential for partnerships...

We have added another item in Chapter I, B. Purpose of the Plan to clarify the importance of partnerships. At the very end of this section, we will add the following as a fifth item:

5. Improve coordination with other agencies, organizations, or individuals involved in similar or other efforts related to the purpose of Bannack. These could include, but are not limited to, the Montana Historical Society, State Historic Preservation Office, Montana Heritage Commission, Bureau of Land Management, and other adjoining landowners. Coordination efforts could include, but are not limited to, the following:
 - general historic preservation and links to similar efforts, such as those in Virginia City,
 - preservation of cultural and natural landscape, viewshed, and setting of Bannack,
 - tourism,
 - interpretation,
 - curation, and
 - archeological resources.

5b. Archaeological resources...

We are revising the details in the action that addresses Goal 4b: “Develop an archaeology plan for Bannack.”

Action A4-9 will include a new sentence, immediately following the sentence “Pursue grants as a funding source.” as follows:

Archeological resource issues will be incorporated into an agreement between Fish, Wildlife and Parks and SHPO that will address consideration and consultation under the State Antiquities Act.

Under Benefits of Action/Justification, include the following new language at the end of the paragraph. The plan will also articulate archaeological resource protection and building preservation efforts, a known area of potential conflict.

5c. Historic Structures Reports and Documentation...

We are adding two new actions under Goal 1b: "Provide consistent and high quality work on the Bannack buildings..." as follows.

A1-4: Continue to improve and maintain the existing record keeping system on Bannack buildings and provide for the safety of such records against loss from fire or other damage. Build staff awareness of and a mechanism for consistent and timely recording of changes to buildings.

A1-5: Initiate steps to update the National Register/National Historical Landmark documentation.

Benefits of Actions/Justification: Consistent, timely record keeping will provide needed information for revising the National Register information for Bannack, which is out-of-date and incomplete. Better descriptions of the built environment are warranted and the historic context and significance of the town needs to be expanded and encompass the layers of history reflected in the buildings.

5d. Concern about "state of disrepair."

Comments noted and see responses (below) to issues raised by Herb Dawson (See FWP Response #6).

Public Comment #6: Finally, Herb Dawson, Historic Architect, listed a number of specific recommendations to deal with historic structure maintenance, stabilization and documentation.

FWP Response #6:

6. Herb Dawson

6a. Breaking down three building categories to add even more categories.

Your comment is noted. To make the plan easy to use, we will retain the three major categories without further breakdown at this time.

6b. Record keeping in two locations for safety.

We have added another action, A1-4, specifically to clarify the need to improve and maintain record keeping (See FWP Response #5c).

6c. Concern about what can be done "in-house."

The yet-to-be-completed agreement with SHPO will define what is considered "routine maintenance." This agreement should consider the capabilities of the staff maintenance crew, which could be a crew that serves several different sites and agencies and which could have considerable experience. We have changed the fourth sentence in item 3 under "Intent" of the Bannack Preservation Philosophy as follows (new language in italics):

This work may include, but is not limited to: replacing chinking and daubing, ~~replacing windows, replacing rotting sill logs and floor joists,~~ *repairing window sash,* and repairing and replacing roofing.

6d. Principal to principle and sagebrush fire danger and ghost town character.

Changes noted for spelling/grammar.

See response to Comment 6a.

6e. Schedule of repairs/maintenance.

A complete priority listing of work for each building will be developed (Action A1-3). In addition, Bannack staff will develop a routine maintenance program (Principle 2 under Preservation Principles).

"Arrested decay" is no longer a suggested management approach under this management plan.

Determining exactly what each building needs for long-term protection and public safety will be part of the Historic Structures Report for each building.

6f. Regarding photo documentation for files.

We have added another action, A1-4, specifically to clarify the need to improve and maintain record keeping (See FWP Response #5c).

6g. Concern about appearance of "state of disrepair" meaning that repairs will be inadequate.

Parameter 3 under Level 1 Preservation indicates buildings will be preserved so that "they appear to be in a 'state of disrepair'" and what you describe as "amateur house repair" is exactly the intent of this approach. You are right that determining to use a patch here and there on a roof, for example, or to completely replace the roof will be a difficult call in some cases. The Historic Structures Report should clarify which major repairs are necessary for long-term preservation.

6h. Concern about leaving windows open

Point noted. The last sentence of Level 1 Preservation, 3. Details, C. Windows will be changed as follows:

In cases where ~~water~~ damage would be minimal (*as in the case of outbuildings or sheds*), window openings may be left open to add to the sense of abandonment.

6i. Comments about using borate on logs....

Comments noted. First sentence of Level 1 Preservation, 3. Details, D. Logs will be changed as follows:

Logs should be treated ~~with a clear preservative~~ to prevent possible insect infestation when necessary *in a manner that preserves the appearance of the log in the overall context of the building.*

6j. Request that all doors work properly.

Comment noted. All doors in Bannack do work properly. Last sentence of Level 1 Preservation, 3. Details, F. Doors will be changed as follows:

Instead, the door or the doorframe will be modified ~~if the door needs to close for~~ *the door to function adequately.*

Public Comment #7: One comment (Crandell Gustafson) expressed concern about removal of sagebrush in the historic town-site in the name of fire protection or prevention. Fire extinguishing equipment and staff training, were suggested as alternatives to sagebrush removal.

FWP Response #7:

7. Crandall Gustafson

7a. Concerned that the removal of sagebrush will take away from the ghost town "feeling." Sagebrush in town was discussed in depth at many meetings prior to the development of the draft plan. Concerns included the fire hazard of sagebrush as well as how sagebrush in town definitely contributes to the overall atmosphere of the town as a true ghost town. After much serious discussion considering both points of view, the steering committee was able to reach a consensus and recommended a very specific plan that reduces fire risk but maintains much sagebrush throughout town. Detailed maps showing which sagebrush will be removed is included in Appendix N, "Fire Risk Assessment and Recommendations," in the Management Plan. This information was not included in detail in the Executive Summary, but is available for your review.

7b. A system is needed to contain and extinguish a fire, e.g., trained personnel, etc. Appendix N in the Management Plan includes several pages of detailed recommendations for staff education and training, operations and maintenance, fire detection systems, and fire extinguisher systems. This information was not included in detail in the Executive Summary, but is available for your review.

Public Comment #8: State Senator-Elect, Bill Tash, Sr., commented that a new perimeter fence for the cemetery was desirable.

FWP Response #8:

8. Bill Tash, Sr.

8a. New jack fence perimeter around the new cemetery.

Generally speaking, this level of detail was not addressed in the Plan. Replacement of things such as fencing will be a normal maintenance activity and will be prioritized and attended to as necessary.

Public Comment #9: Another comment (Jolene Ellerton) favored proposals to develop interpretive trails, offer mill tours, continue the Bannack Days celebration, continue the use of brochures to disseminate walking tour information, and to limit vehicles, bikes and horses on Main Street.

FWP Response #9:

9. Jolene Ellerton
Comments noted.

Public Comment #10: Wayne Fitzwater supported the construction of a museum at Bannack.

FWP Response #10:

10. Wayne Fitzwater

10a. Would like to see a museum.

A museum is part of the ten-year management plan.

10b. Contributing items for museum display....

How to acquire artifacts and which artifacts to acquire are addressed in detail in the management plan, but this information was summarized into less than half a page in the Executive Summary. Goal 4c of the management plan addresses acquisition, maintenance and storage of artifacts. Four separate policies and five action strategies address this topic.

Public Comment #11: FWP Director, Pat Graham, offered congratulations and thanks on the completion of the Bannack Management Plan. Mr. Graham additionally commented on the basic preservation philosophy for Bannack historic buildings and posed the question, "at what point do you determine that decay has gone so far that it needs to be halted?" A specific concern regarding preservation of historic building interiors was also expressed.

FWP Response #11:

11. Pat Graham

11a. Not clear how this will work without "getting out on the ground," plan is too "easy to read too much or too little into what is being said."

The Preservation Philosophy was developed based on the experience of Bannack staff and in consultation with the State Historic Preservation Office (SHPO) and State Historical Society. The intent was to define a general philosophy with specific guidelines and methodologies to preserve the buildings. We have since received additional comments on the draft Preservation Philosophy from SHPO and Historical Society and we are addressing those as well.

11b. Concern about protecting interior of buildings—mentions daubing in particular.

The Preservation Philosophy prescribes methods for weatherproofing so that rain and snow are kept out of the buildings. The Preservation Philosophy does not include "arrested decay" as a preservation guide. "Arrested decay" has proved over the past several years at Bannack to be an unclear prescription for repair and renovation, resulting in inconsistency to building maintenance. Regarding your specific question about daubing and keeping out the elements, please refer to the guidelines for daubing under each of the preservation categories in the Preservation Philosophy. Even in the Level 1 structures, daubing will be replaced as necessary to prevent water from entering the building.

Appeal Process

The public has two opportunities to appeal specific decisions made in the Bannack State Park Management Plan. A decision must be appealed first to the Director of FWP. If the Director upholds the original decision, management plan decisions may be appealed to the FWP Commission, which is the final decision-maker in such cases. The Commission may uphold the original decision, request specific changes, or ask that staff take a fresh look at particular issues. The Commission only plays a decision-making role on a park management plan in cases where the decision has first been the subject of an initial appeal to the Director, and then followed with an appeal to the Commission. Any portions of the plan not specifically appealed are in effect following the Director's approval. The appeal must specify the appealed items; it is not sufficient to just appeal the Plan as a whole without being explicit about what is objectionable.

Decision Recommendation

Region Three and the Parks Division recommends that the preferred alternative in the public review draft of the Bannack State Park Management Plan be adopted with the additions and modifications

spelled out in the **Public Comment Summary** section under the specific **FWP Response** to each of the individual comments received.

A copy of the public comment summary and decision notice will be added to the final Plan as an appendix.